

**Department of Environmental Conservation  
Response to Comments**

**For**

**Alaska SeaLife Center**

**APDES Permit No. AK0052566**

**Public Noticed March 27, 2014 through April 28, 2014**

**June 11, 2014**



**Alaska Department of Environmental Conservation  
Wastewater Discharge Authorization Program  
555 Cordova Street  
Anchorage, AK 99501**

## **1 Introduction**

### **1.1 Summary of Facility / Permit**

The Seward Association for the Advancement of Marine Science (SAAMS) operates the Alaska SeaLife Center (ASLC) and the adjoining Steller South Beach Facility (SSBF) in Seward, Alaska. The ASLC generates and shares scientific knowledge that promotes understanding and stewardship of Alaska's marine ecosystem. Both ASLC and SSBF have outfalls that discharge to Resurrection Bay. The ASLC facility contains sea water and fresh water systems that support two large marine mammal tanks, one seabird habitat, indoor and outdoor research pools, rescue and rehabilitation tanks and pools, and numerous aquaria. Ozone disinfection systems are provided on the marine mammal and marine bird habitat recirculating life support systems, and on the contaminated waste water discharge systems.

The ASLC can discharge up to 8.1 million gallons per day (MGD) and is referred to as Outfall 001A. The discharge will be monitored for flow, fecal coliform bacteria, enterococci bacteria, pH, and dissolved oxygen.

The SSBF has four pools containing a combined 28,942 gallons that have been used intermittently as a short-term marine animal holding facility. The SSBF discharge water is untreated and no chemicals are added to the effluent.

The SSBF, when in use, has a continual flow of seawater up to 1.7 MGD and is referred to as Outfall 002A. The discharge will be monitored for flow, fecal coliform bacteria, enterococci bacteria and pH.

### **1.2 Opportunities for Public Participation**

The Department of Environmental Conservation (DEC or Department) proposed to issue an Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge permit to the Alaska SeaLife Center. To ensure public, agency, and tribal notification and opportunities for participation, the Department:

- identified the permit on the annual Permit Issuance Plan posted online at:  
<http://www.dec.state.ak.us/water/wwdp/index.htm>
- notified potentially affected tribes on November 7, 2013 that the Department would be working on this permit via letter, fax and/or email
- posted a preliminary draft permit on-line for a 10-day applicant review March 3, 2014 through March 17, 2014 and notified tribes and other agencies
- posted a draft permit for public notice on the Department's public notice web page on March 27, 2014 through April 28, 2014
- posted the proposed final permit on-line for a 5-day applicant review on May 29, 2014

- sent email notifications via the APDES Program List Serve when the preliminary draft, draft, and proposed final permits were available for review

The Department received comments from the Environmental Protection Agency (EPA) on the draft permit and supporting documents. The Department requested comment from the Departments of Natural Resources, Fish and Game, the National Marine Fisheries Service, and the U.S. Fish and Wildlife Service.

This document summarizes the comments submitted and the justification for any action taken or not taken by DEC in response to the comments.

### **1.3 Final Permit**

The final permit was adopted by the Department on June 18, 2014. There were changes from the public noticed permit fact sheet. The minor changes are identified in the response to comments and reflected in the final fact sheet for the permit.

## **2 Comment on Pollutants of Concern**

### **2.1 Comment Summary**

The Department received a comment from EPA stating the identification of the pollutants of concern in the fact sheet was not clear.

#### **Response:**

A statement was added to the beginning of fact sheet Section 4.4 that identifies the pollutants of concern.

## **3 Comment on Reasonable Potential Analysis**

### **3.1 Comment Summary**

The Department received a comment from EPA regarding incomplete documentation of a reasonable potential analysis for bacteria, which is a known pollutant in the wastewater.

#### **Response:**

The previous permit did not have requirements for bacteria limits or monitoring; therefore, there is no bacteria data to conduct a reasonable potential analysis. The Department added the bacteria monitoring requirements this permit cycle so that data could be gathered for future decisions regarding the necessity of bacterial limits and/or monitoring. No change was made to the permit documents based on the comment.

## **4 Comment on Monitoring Requirements**

### **4.1 Comment Summary**

The Department received a comment from EPA on whether monitoring for dissolved oxygen is required for Outfall 001B.

**Response:**

Dissolved oxygen (DO) monitoring was added to Outfall 001A monitoring requirements in the subject permit as the majority of the wastewater discharged from Outfall 001A is treated with ozone. Water discharged through Outfall 001B is not treated and there is no concern about increased DO levels. No change was made to the permit documents based on the comment.

## **4.2 Comment Summary**

EPA commented that removing monitoring requirements from the permit during the permit cycle (Page 11, Section 4.4 of the Fact Sheet) would constitute a major modification of the permit.

**Response:**

Both EPA and the Department have implemented this approach in NPDES and APDES permits in Alaska (e.g., Alyeska Valdez Marine Terminal). The Department disagrees that a discontinuation of monitoring as specified in the fact sheet and permit would require a major modification of the permit as the proposed draft permit (Conditions 1.2.6 and 1.2.7) includes language allowing such a reduction. No change was made to the permit documents based on the comment.

## **5 Minor Changes**

### **5.1 Minor Change Summary**

The applicant requested we make two minor changes, one to the permit and one to the fact sheet during their 5 day applicant review period.

Section 2.2.5 of the permit makes reference to a “plant manager”; the permittee requested the wording be changed to read “facilities director”.

Section 7 of the fact sheet states the ASLC’s mission statement. The mission statement was an outdated version; the permittee requested we update to the current mission statement.

**Response:**

Both of these minor changes were made to the final permit.